

Subcontractor Oversight Procedure

This procedure shall be used by host/requestor/project manager (referred to as host hereafter) to manage work performed by subcontractors on Ames Laboratory premises.

1.0 APPROVAL RECORD

- Reviewed by: Document Control Coordinator (Amy Tehan)
- Reviewed by: Facilities and Engineering Services Manager (Mark Grootveld)
- Approved by: Quality Assurance Manager & ESH&A Manager (Tom E. Wessels)
- Approved by: Interim Deputy Director (David Baldwin)

The official approval record for this document is maintained in the Training, Documents & Records Management Office, 151 TASF.

2.0 REVISION/REVIEW INFORMATION

The revision description for this document is available from and maintained by the author.

3.0 PURPOSE AND SCOPE

This procedure shall be used to ensure the safety of Ames Laboratory employees, protection of property, and the safety of subcontractors.

This procedure will outline:

1. The process used to determine the rigor of oversight needed according to the Oversight Levels I, II or III.
2. The requirement of the host to perform a Job Safety Analysis (JSA). This is a method of hazard identification, hazard mitigation and communicating to those affected.
3. Training requirements for the subcontractor based on the Oversight Levels.
4. The responsibilities of the host and escort.
5. The requirements for Basic Ordering Agreement Contracts.
6. The method used to perform post performance assessment work completed by subcontractor(s).

4.0 DEFINITIONS

Basic Ordering Agreement

A Basic Ordering Agreement is a contract provided to a pre-approved subcontractor for intermittent work on a long term basis.

| | | | |
|-----------------------|---------------------|-----------------------|---------|
| Contact Person | Shawn Nelson | Revision | 4 |
| Document | Procedure 10200.046 | Effective Date | 1/01/14 |
| | | Review Date | 1/01/16 |

General / Site Orientation Training

This is checklist of preselected topics to be discussed with contractors when coming on site and before starting work. See form 10200.101, this is a subset of the JSA Packet, Form 10200.139.

Graded Approach

The graded approach concept refers to the process of ensuring that the level of analysis, documentation, and actions are commensurate with characteristics related to an activity. This includes relative importance to safety, safeguards and security, and other relevant factors. Ames Laboratory does not apply requirements uniformly across all activities. Applying requirements uniformly would not necessarily add value or reduce risks and could be an ineffective allocation of resources.

Hazard Management Statement(s)

The Hazard Management Statement shall define the extent of the hazard and the controls (i.e., engineering, administrative or personal protective equipment) utilized to minimize the risks associated with the hazard. The detail of the Hazard Management Statement(s) shall be commensurate to the scope and the magnitude of the hazard and the associated risk.

Host/Requestor/Project Manager (hereafter referred to as Host)

The host serves as the lead to initiate subcontract work. This person is also the lead to manage a project.

Job-Specific Training

Job-specific training is training for subcontractors required due to the potential hazards that may be encountered in a specific location or performing a particular task/operation.

Subcontractor Escort

A subcontractor escort is an Ames Laboratory employee or associate who will lead and monitor subcontractor(s) performing work. The escort is responsible for communicating area hazards and emergency procedures. The escort is also responsible to ensure work is performed safely and to stop work if necessary. An escort does not need to monitor subcontractor work every minute of a task, but the escort does need to be in the general area and check on the work regularly. An escort may be used in lieu of performing the Subcontractor Oversight Procedure (Packet 10200.139). However, Form 10200.101 Subcontractor Safety Briefing should still be performed

Subcontractor Oversight Levels

| Subcontractor Oversight Levels I, II or III | |
|--|--|
| <p>Oversight Level I includes activities with minimal scope and magnitude (low risk). Examples include the following:</p> <ul style="list-style-type: none"> • Design firms / Architects • Estimators • Computer Programming (i.e., CCURE, PERMAR, CYBER TRAIN, DELTEK, etc.) | |
| <p>Oversight Level II includes activities such as:</p> <ul style="list-style-type: none"> • the installation/repair/calibration of equipment or instruments • demolition / construction • decorating / painting / remodeling | |
| <p>Oversight Level III includes activities that involve a large scale of work such as:</p> <ul style="list-style-type: none"> • New buildings • Large scale construction/renovation/demolition (>\$5 Million) • Projects with broad scope (long duration, numerous trades, complex) • Significant risk of damaging facilities or impeding the mission of the Laboratory. | |

Subcontractor

Anyone involved in activities such as the installation and repair of research equipment, maintenance, demolition, construction, decorating, painting, remodeling, instrument calibration and alteration including painting. This program does not apply to vendors.

Vendor

Anyone who performs routine or repeat activities such as food service suppliers, office equipment repair, computer specialists, sales, consultants, etc. These activities have hazards which are similar to those encountered and/or accepted by the general public in an office environment. The Subcontractor Oversight Procedure does not apply to vendors.

5.0 SUBCONTRACTOR APPROVAL PROCEDURE

The following steps, along with corresponding responsibilities, shall be taken when subcontractor work is performed at the Ames Laboratory. Shaded steps are actions taken to initiate work or actual work performed by subcontractor; no further action required by host or ESH&A.

| Step | Action | Responsibility |
|------|--|---|
| 1. | ESH&A is made aware of subcontractor work via electronic notification/approval (CostPoint) that is reviewed by a primary person and a backup person in ESH&A. When subcontractor work is identified, the safety specialists contact the Ames Lab Host and classify Oversight Level. | <i>Purchasing and Property Management</i> |
| 2. | Classify the Subcontractor Oversight Levels (I, II or III). | <i>ESH&A</i> |
| 3. | <p><u>For Oversight Level I</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Escort the visitor. <input type="checkbox"/> Follow the Service Call Oversight Guide 10200.010 (onsite work). <p>NOTE: The Requestor is notified by Purchasing and Property Services when a PO is placed. In that notification, a link to Guide 10200.010 is provided.</p> <p>**Oversight Level I - Procedure Complete**</p> <p><u>For Oversight Level II</u></p> <ul style="list-style-type: none"> • Proceed to Step #4 <p>NOTE: If subcontractor is escorted by an Ames Laboratory employee or associate, steps 4 thru 6 may be waived. Form 10200.101 Subcontractor Safety Briefing may be used as a guide.</p> <p><u>For Oversight Level III</u></p> <ul style="list-style-type: none"> • Meet with Manager of Purchasing and Property Services to determine path forward. | <i>Host</i> |

| | | |
|------------|--|-----------------------------|
| 4. | <p>ESH&A reviews and approves or disapproves the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Contractor Written Safety and Health Program and <input type="checkbox"/> Contractor Safety Information Questionnaire (Form 10200.140) <p>Note: Plan Review Guide 10200.138 can be used as necessary – graded approach.</p> | <i>ESH&A</i> |
| 5. | <p>Complete Subcontractor Job Safety Analysis (JSA) Packet, Form 10200.139.</p> <p>If subcontractor does not have written programs, the subcontractor may comply with Ames Laboratory Procedures (as approved by ESH&A).</p> <p>For very short duration jobs, single trade, minimal hazards, etc., the written plans and review of safety information questionnaire may be waived (graded approach commensurate with work being performed).</p> <p>Refusal to supply written programs may disqualify a subcontractor from receiving award.</p> | <i>Host</i> |
| 6. | ESH&A reviews JSA and approves or disapproves. | <i>ESH&A</i> |
| 7. | <p>If ESH&A approves JSA, the following will be performed when contractor comes on site:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Pre-job briefing using the JSA and Subcontractor Safety Briefing Form 10200.139 <input type="checkbox"/> Communicate expected hazards and controls. <input type="checkbox"/> Review of Ames Laboratory - Visitor Safety Guide. | <i>Host or ESHA</i> |
| 8. | Subcontractor Performs Work | |
| 9. | <p>Monitor work to ensure it is being performed safely.</p> <p>Notify ESH&A of suspected non-compliance.</p> | <i>Host & ESH&A</i> |
| 10. | <p>Perform post performance review using the provided guide in JSA Packet 10200.139 or other means including a simple email, memo, or phone call providing feedback of work.</p> | <i>Host & ESH&A</i> |

6.0 Basic Ordering Agreement Requirements

A Basic Ordering Agreement (BOA) is a contract provided to a pre-approved subcontractor for intermittent work on a long term basis (~12 months). This provides for a relationship with a company having proven safety performance at the laboratory and a cost/time savings for routine work performed that cannot be performed by on-site staff due to Davis/Bacon Act.

To be approved to perform work under a BOA, subcontractors shall:

- Provide written safety and health plans for review and approval.
- Complete and provide Safety Information Questionnaire for review and approval.

| | | | |
|-----------------------|---------------------|-----------------------|---------|
| Contact Person | Shawn Nelson | Revision | 4 |
| Document | Procedure 10200.046 | Effective Date | 1/01/14 |
| | | Review Date | 1/01/16 |

- Complete general safety training and site orientation training.
- Be provided with badges by Plant Protection for a period, not to exceed twelve months, once safety training and site orientation is complete.
- Receive job-specific training for each new project.

Note: the host should still perform post-performance evaluations after each project.